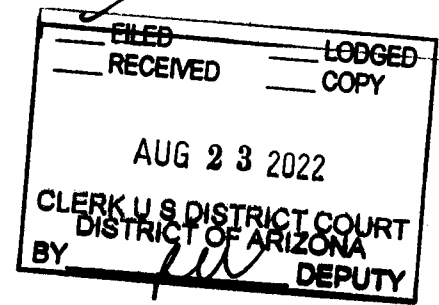


GARY M. RESTAINO
 United States Attorney
 District of Arizona
 DAVID A. PIMSNER
 Arizona State Bar No. 007480
 Email: David.Pimsner@usdoj.gov
 KEVIN C. HAKALA
 Colorado State Bar No. 41335
 Email: Kevin.Hakala@usdoj.gov
 Assistant United States Attorneys
 Two Renaissance Square
 40 N. Central Ave., Suite 1800
 Phoenix, Arizona 85004
 Telephone: 602-514-7500
 Attorneys for Plaintiff



SEALED

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA

United States of America,
 Plaintiff,

vs.

Ali Joseph,
 aka Abu Rahaf,
 aka Ali Kazem Youssef,
 Defendant.

No. CR-22-01070-PHX-DJH (DMF)

INDICTMENT

VIO: 18 U.S.C. § 1958(a)
 (Use of Interstate Commerce
 Facilities in the Commission of
 Murder-For-Hire)
 Count 1

18 U.S.C. §§ 981 and 982,
 21 U.S.C. §§ 853 and 881, and
 28 U.S.C. § 2461(c)
 (Forfeiture Allegation)

THE GRAND JURY CHARGES:

COUNT 1

Between on or about May 9, 2022, and on or about August 23, 2022, in the District of Arizona and elsewhere, the defendant, ALI JOSEPH, aka Abu Rahaf, aka Ali Kazem Youssef, did use a facility of interstate commerce, and did cause another to use a facility of interstate commerce, including a telephone and an internet-based encrypted messaging

1 application, with the intent that the murder of victim A. A. be committed in violation of
 2 the laws of the United States and the State of Arizona, as consideration for the receipt of,
 3 and as consideration for a promise and agreement to pay anything of pecuniary value, to
 4 wit: approximately \$3,000.00.

5 In violation of Title 18, United States Code, Section 1958(a).

6 **FORFEITURE ALLEGATION**

7 The Grand Jury realleges and incorporates the allegations of Count 1 of this
 8 Indictment, which are incorporated by reference as though fully set forth herein.

9 Pursuant to Title 18, United States Code, Sections 981 and 982, Title 21, United
 10 States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), and
 11 upon conviction of the offense alleged in Count 1 of this Indictment, the defendant shall
 12 forfeit to the United States of America all right, title, and interest in (a) any property
 13 constituting, or derived from, any proceeds the persons obtained, directly or indirectly, as
 14 the result of the offense, and (b) any of the defendant's property used, or intended to be
 15 used, in any manner or part, to commit, or to facilitate the commission of such offense.

16 If any of the forfeitable property, as a result of any act or omission of the
 17 defendant(s):

- 18 (1) cannot be located upon the exercise of due diligence,
- 19 (2) has been transferred or sold to, or deposited with, a third party,
- 20 (3) has been placed beyond the jurisdiction of the court,
- 21 (4) has been substantially diminished in value, or
- 22 (5) has been commingled with other property which cannot be divided without
- 23 difficulty,

24 it is the intent of the United States to seek forfeiture of any other property of said
 25 defendant(s) up to the value of the above-described forfeitable property, pursuant to Title
 26 21, United States Code, Section 853(p).

1 All in accordance with Title 18, United States Code, Sections 981 and 982, Title 21,
2 United States Code, Sections 853 and 881, Title 28, United States Code Section 2461(c),
3 and Rule 32.2, Federal Rules of Criminal Procedure.

4 A TRUE BILL

5 /s/

6 FOREPERSON OF THE GRAND JURY
7 Date: August 23, 2022

8 GARY M. RESTAINO
9 United States Attorney
District of Arizona

10 /s/

11 DAVID A. PIMSNER
12 KEVIN C. HAKALA
Assistant U.S. Attorneys